Opportunities for Adult Immunization in the ACA

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Broad changes to vaccine access are underway as the ACA is implemented

- **Non-grandfathered health plans**
  - New coverage standard for preventive services at first-dollar.

- **Medicaid expansion**
  - Increased eligibility of childless adults
  - New benefits package
  - Reimbursement bump for Medicaid providers
  - 1% FMAP for adult vaccines

- **Medicare incentives**
  - CMS is reviewing opportunities for incentives within Part D plans
Opportunity #1:
Expand definition of in-network providers

- **Issue:** Health plan and Medicaid networks do not expressly include community immunizers such as pharmacists, school-based clinics or public health clinics as in-network providers.

- **Possible activities:**
  - Educate CMS / CCIIO and private health plans on the importance of including a broad array of immunizers as part of enforcing the concept of “network adequacy.”
  - Develop projects with pharmacy associations to gather data on vaccination in pharmacy offices.
  - Support CDC 3rd Party Billing Project in all appropriate states as a mechanism to reach some adults.

Opportunity #2:
Medicaid Expansion

- **Issue:** Expansion and implementation of the Exchanges will be extremely varied given the SCOTUS decision

- **Key provisions offer an opportunity to expand access for adults:**
  - Potential addition of approximately 15 million newly eligible persons (mainly adults).
  - New eligible population must be offered an “alternative benefits package” benchmarked to Essential Health Benefits.
  - Medicaid primary care providers will receive Medicare reimbursement rates for preventive services for 2013 and 2014.
  - States have access to an increase (1%) in Federal match (FMAP) for covering adult vaccines.
Possible activities: Medicaid Expansion

- Follow state implementation of Medicaid expansion, especially the decision of States related to adult vaccines with no cost-sharing.
- Discuss interpretation of statute and regulations and reinforce the importance of coverage standard for adults with HHS Office of Health Reform, CDC and NVPO.
- Continue to advocate for full access to adult vaccines at first dollar for both new and Traditional Medicaid beneficiaries.
- Encourage states to take advantage of the 1% FMAP should they decide to cover adult vaccines at first dollar.
Possible activities: Medicaid Expansion

- **Issue:** Implementation of the Medicaid bump may be slow in the states, does not apply to Ob–Gyns and needs to be measured.

- **Next steps:**
  - Support efforts by ASTHO, NACCHO, AIM and other stakeholders to encourage states to implement and communicate on the Medicaid bump.
  - Support efforts by ASTHO, NVPO and others to develop rapid measurements of the impact of the bump on provider vaccination activity.
  - Continue to advocate for inclusion of Ob–Gyns as primary care providers eligible for the Medicaid bump.

Opportunity #3: Medicare incentives

- **Issue:** Vaccines for seniors are divided between Medicare Parts B and D. This causes both beneficiary and provider issues.

- **Possible Activities:**
  - Support provisions included in pending legislation from Senator Jack Reed (D–RI).
  - Proposed bill contains language that would include all ACIP–recommended vaccines in both Part B and Part D.